

1 **Thomas P. Riley, SBN 194706**
2 **LAW OFFICES OF THOMAS P. RILEY, P.C.**
3 **First Library Square**
4 **1114 Fremont Avenue**
5 **South Pasadena, CA 91030-3227**

6 **Tel: 626-799-9797**
7 **Fax: 626-799-9795**
8 **TPRLAW@att.net**

9 **Attorneys for Plaintiff**
10 **J & J Sports Productions, Inc.**

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

14 **J & J SPORTS PRODUCTIONS, INC.,**

15 **Plaintiff,**

16 **v.**

17 **ANTONIO SANCHEZ ORTEGA a/k/a**
18 **ANTONIO ORTEGA, et al.,**

19 **Defendants.**

20 **CASE NO. 3:14-cv-03949-WHO**

21 **PLAINTIFF'S *EX PARTE***
22 **APPLICATION FOR AN ORDER**
23 **CONTINUING THE CASE**
24 **MANAGEMENT CONFERENCE; AND**
25 **ORDER**

26 **TO THE HONORABLE WILLIAM H. ORRICK, THE DEFENDANT AND HIS**
27 **ATTORNEY/S OF RECORD:**

28 Plaintiff J & J Sports Productions, Inc., hereby applies *ex parte* for an order continuing the Case Management Conference presently set for Tuesday, December 9, 2014 at 2:00 PM. As set forth below Plaintiff respectfully requests that the Court continue the Case Management Conference to a new date approximately Thirty (30) to Forty-Five (45) days forward.

The request for the brief continuance is necessitated by the fact that Plaintiff has not yet perfected service of the initiating suit papers upon the Defendant Antonio Sanchez Ortega a/k/a Antonio Ortega, individually and d/b/a Plaza Garibaldi. As a result, Plaintiff's counsel has not conferred with the defendant concerning the claims, discovery, settlement, ADR or any of the other pertinent issues involving the case itself or the preparation of a Joint Case Management Conference Statement.

1 Plaintiff recently identified an alternative address that it believes will be successful to serve
2 its initiating suit papers, upon the Defendant.

3 In addition, Thomas P. Riley, Plaintiff's counsel in this action, has a calendaring conflict on
4 Tuesday, December 9, 2014 as Mr. Riley is ordered to personally appear before the Honorable Paul L.
5 Abrams of the U.S.D.C. for the Central District of California, Western Division in the matter of *J & J*
6 *Sports Productions, Inc. v. Senehi, et al.*,; Case No. 2:12-cv-07846-PLA for a status conference at 10:00
7 AM that very same day (ECF# 57).

8 **WHEREFORE**, Plaintiff respectfully requests that this Honorable Court continue the Case
9 Management Conference, presently scheduled for Tuesday, December 9, 2014 at 2:00 PM.

10
11 Respectfully submitted,
12
13
14

15 Dated: November 26, 2014

/s/ Thomas P. Riley

LAW OFFICES OF THOMAS P. RILEY, P.C.

By: Thomas P. Riley

Attorneys for Plaintiff

J & J Sports Productions, Inc.

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

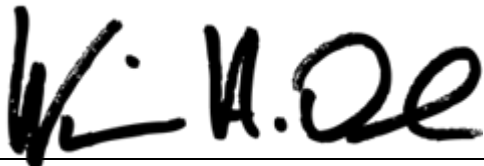
28 ///

ORDER

1
2 It is hereby ordered that the Case Management Conference in civil action number 3:14-cv-03949-
3 WHO styled *J & J Sports Productions, Inc. v. Ortega*, is hereby continued from 2:00 PM, Tuesday,
4 December 9, 2014 to 2:00 p.m. on Tuesday, January 20, 2015.

5 Plaintiff shall serve a copy of this Order on the Defendant and thereafter file a Certification of
6 Service of this Order with the Clerk of the Court.

7
8
9 **IT IS SO ORDERED:**

10 
11
12

Dated: December 1, 2014

13 **THE HONORABLE WILLIAM H. ORRICK**
14 **United States District Court**
15 **Northern District of California**

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 **PROOF OF SERVICE (SERVICE BY MAIL)**

I declare that:

1 I am employed in the County of Los Angeles, California. I am over the age of eighteen years
2 and not a party to the within cause; my business address is 1114 Fremont Avenue, South Pasadena,
3 California. I am readily familiar with this law firm's practice for collection and processing of
4 correspondence/documents for mail in the ordinary course of business.

5
6 On November 26, 2014, I caused to serve the following documents entitled:

7
8 **PLAINTIFF'S *EX PARTE* APPLICATION FOR AN ORDER CONTINUING THE
CASE MANAGEMENT CONFERENCE; AND ORDER (Proposed)**

9 On all parties in said cause by enclosing a true copy thereof in a sealed envelope with postage
10 prepaid and following ordinary business practices, said envelope was addressed to:

11
12 Antonio Sanchez Ortega a/k/a Antonio Ortega (Defendant)
13 250 23rd Street
14 Richmond, CA 94804

15 The fully sealed envelope with pre-paid postage was thereafter placed in our law firm's
16 outbound mail receptacle in order that this particular piece of mail could be taken to the United States
17 Post Office in South Pasadena, California later this day by myself (or by another administrative
18 assistant duly employed by our law firm).

19 I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing
20 is true and correct, and that this declaration was executed on November 26, 2014, at South Pasadena,
21 California.

22
23 Dated: November 26, 2014

/s/ Vanessa Morales
VANESSA MORALES